

review would result in the Respondent being irreparably harmed and irreparably prejudiced.

4. In this case, upon a full, diligent, complete and accurate investigation conducted by me Jaydeep Biswas and Astra's directors, of the Petitioners MidOil USA, LLC, Vincent Crandon (alk/a Vincent J. Ceccola) and Christine Crandon, it was discovered by me and Astra directors that the Petitioners, upon information and belief, fraudulently induced me Jaydeep Biswas and Astra Project to enter a Corporate Financing Agreement (CFA), as well as the inserted arbitration clause provision 23.1, dated, 1/11/2012. However, the Petitioner's fraud was not discovered by me until after the contract had been executed.

WHEREFORE the Respondents respectfully moves this Court for an Emergency Order: 1) in favor of the Respondent and against the Petitioner granting an emergency stay of arbitration; and (2) an Emergency Order in favor of the Respondent and against the Petitioner, compelling judicial review of the allegation of fraudulent inducement of the Arbitration clause provision 23.1 in the contract (CFA) by the United States District Court, Southern District of New York or by remand to the Superior Court of New Jersey, Bergen County, the Court of original jurisdiction; and/or (3) an Emergency Order dismissing with prejudice the Petitioner's Petition to Compel Arbitration in the United States District Court for the Southern District of New York; and (4) any other relief the Court deems just and proper.

VERIFICATION

) ss.:
)

DR. JAYDEEP BISWAS, being duly sworn, and heard, says:

Deponent is a party to the above entitled action; deponent has read the foregoing Affidavit in Support and knows the contents thereof; the same is true deponent's own knowledge, except as to the matters therein stated to be alleged on information and belief, and as to those matters component believes it to be true.

Brisbane, Australia

Sworn to (or affirmed) and subscribed before me

This 24th day of June 2013,

Jennifer Leslie Williamson

Notary Public's Signature Notary Name

~~Personally Known~~ Or

Type of Identification Produced Australian Passport No. E 400362

Brisbane

Dated: Sydney, Australia

24th June _____, 2013

J. Biswas

JENNIFER LESLIE WILLIAMSON
NOTARY PUBLIC
4 RAKEEVAN ROAD GRACEVILLE
QUEENSLAND AUSTRALIA
MY COMMISSION DOES NOT EXPIRE

JAYDEEP BISWAS
Director, of Astra Project
Finance Pty Ltd
(Australian Company
Number 143 030 675)

